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March 22, 2021

Via ECF

Honorable John P. Cronan, U.S.D.J.
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Peralta v. City of New York, et al. SDNY Case No. 20-CV-4884 (JPC)

Dear Judge Cronan:

My office represents the plaintiff, Jordy Peralta, in the above-referenced case. I am writing to request a 60-day extension of time to serve defendants John Does 1-3. The current deadline to serve the Complaint is March 23, 2021. The new deadline would be May 24, 2021. This is Plaintiff's fourth request for an extension of time.

Additional time is needed to identify the John Doe defendants. The John Does are all police officers employed by the City of New York who participated in unlawful conduct against Plaintiff. The City has provided the name of one of the John Does, detective Joseph Walsh, who was the partner of the arresting officer and named defendant Brandon Gembecki. However, we still do not have the name of the other two officers involved in the incident. Counsel for the City of New York has informed us that she has provided us with all of the information that she has to date.

An extension of time will allow Plaintiff to work with the City to identify the remaining two John Doe defendants. It will also allow Plaintiff to file a single Amended Complaint naming all of the individual officers involved in the incident rather than doing so in a piecemeal fashion. The proposed deadline should not cause any delays to the deadlines to be discussed at the upcoming initial conference.

Respectfully,

/s/ Joshua Tarrant-Windt

Joshua Tarrant-Windt

cc: All Counsel of Record (Via ECF)